

United States Department of the Interior

BUREAU OF LAND MANAGEMENT Sevier River Resource Area 150 East 900 North Richfield, Utah 84701



IN REPLY REFER TO:

3809 (U-056)

March 3, 1994



Shaun Williams
Environmental Coordinator
Georgia-Pacific Corporation
P.O. Box 80
Sigurd, Utah 84657

Dear Mr. Williams:

I received your letter requesting BLM input and approval for reclamation of a reject wallboard landfill which is partially located on public land legally described as Lots 4 and 5 of Section 6, Township 23 South, Range 1 West, Salt Lake Meridian, Utah. This landfill on public land has apparently resulted from an inadvertent encroachment from an adjacent landfill located on property owned by Georgia-Pacific.

We appreciate your cooperation and willingness to reclaim the encroachment on public land however, we have some questions and concerns about your proposal and we need some additional information before we can give approval for your proposal.

Our main concern is whether the removal of sufficient cover material (topsoil) from adjacent public land will create cumulative impacts which would be more significant that the impacts created by the presently existing wallboard reject encroachment. If the cover material could be totally or partially supplied from private land, this would help alleviate most of our concerns.

The following additional information is requested:

- In your letter you use several land designations which are confusing and hard to interpret. You refer to "existing onsite landfill" and "off-site on BLM land". We think the term "on-site landfill" refers to the landfill located on patented or private land belonging to Georgia-Pacific and that "off-site" refers to the segment of landfill which is located on adjacent public land. Please clarify if our interpretation is correct.
- What is the proposed starting date of the reclamation and what is the estimated duration of the reclamation project?

- 3. When was the last date the wallboard reject landfill on public land was used? When was the last date wallboard was placed onto the landfill on public land? Is the public land on which the reject wallboard is located, covered by any mining claims?
- 4. You propose to cover the reject wallboard with 6-12 inches of topsoil. We question whether this would be sufficient. Have you used these same reclamation specifications on other sites and if so, what were the results of reclamation efforts on these sites? It is our opinion that at least 18 inches of cover should be placed over the reject wallboard with 2 feet of cover being the most preferred.
- You request approval to remove topsoil from adjacent public land to use as cover over the landfill encroachment on public land. What is the location and legal description of this adjacent public land? What would be the estimated dimensions and depth of the area where topsoil would be removed? What would be the volume of topsoil removed from public land? What are access needs to the topsoil removal area? Is this public land were removal would occur, presently covered by a mining claim(s) located by Georgia-Pacific or any other known mining claimant(s)? Would the topsoil removal from adjacent public land be considered as an operation "reasonably incident to mining"? How would the topsoil borrow area be reclaimed? What would be the final depth and pit slopes? Would any highwalls result from removal of the topsoil? If so, provide information on height and slope.
- 6. What are the existing slopes of the reject wallboard landfill located on public land? What would be the final slopes after reclamation, i.e. 3:1, 4:1, etc.

After we receive this additional information, we would like to meet with you on site to review your proposal.

Thank you for your cooperation. If you have any questions concerning this request, please contact me, Gary Hall or Michael Jackson.

Sincerely,

for Dave Henderson Area Manager

cc: DOGM